

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

CHAD MICHAEL WALDOCH

**INDICTMENT**

Case No. \_\_\_\_\_

Violation: 18 U.S.C. §§ 981(a)(1)(C); 28  
U.S.C. § 2461(c), and 29 U.S.C. § 501(c)

**Embezzlement of Assets**

The Grand Jury Charges:

From on or about January 11, 2012, through on or about October 23, 2017, in the District of North Dakota, Chad Michael Waldoch, while an officer, that is, Secretary-Treasurer of SMART Local 980, a labor organization engaged in an industry affecting commerce, did embezzle, steal, and unlawfully and willfully abstract and convert to his own use the moneys, funds, property, and other assets of said labor organization in the approximate amount of \$107,706.63;

In violation of Title 29, United States Code, Section 501(c).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of the offense charged in this Indictment,

CHAD MICHAEL WALDOCH

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all of his right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of 29 U.S.C. § 501(c), including, but not limited to the following:

A sum of United States currency representing the amount of proceeds obtained as a result of the offense.

If any of the assets described above as being subject to forfeiture pursuant to 18 U.S.C. § 1955(d), as a result of any act or omission of Chad Michael Waldoch:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28

U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of said property described above as being subject to forfeiture.

A TRUE BILL:

/s/ Foreperson  
Foreperson

DREW H. WRIGLEY  
United States Attorney

/s/ Nicholas W. Chase  
NICHOLAS W. CHASE  
First Assistant United States Attorney

MDG/vt